

Jeffrey M. Pollock
Dominique J. Carroll
Fox Rothschild LLP
997 Lenox Drive
Lawrenceville, NJ 08648
Tel.: (609) 896-3600
Fax: (609) 896-1469
jmpollock@foxrothschild.com
djcarroll@foxrothschild.com

Counsel for Non-Party Season 4, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: 3M COMBAT ARMS
EARPLUG PRODUCTS LIABILITY
LITIGATION

Civil Action No.: 3:21-cv-16546

Lead case: 3:19-md-2885 (N.D. Fla.)

**REVISED DECLARATION OF
DOMINIQUE J. CARROLL, ESQ.**

I, Dominique J. Carroll, of full age, hereby declare, under penalty of perjury,
as follows:

1. I am an attorney at the law firm of Fox Rothschild LLP and counsel for non-party Season 4, LLC regarding the above captioned litigation.
2. I submit this Declaration based upon my personal knowledge, and review of the relevant documents, in support of Season 4's Motion to Quash Subpoena and for a Protective Order.
3. Attached hereto as **Exhibit 1** is a true and correct copy of the subpoena served upon Season 4, by defendants 3M Company, 3M Occupational Safety LLC,

Aearo Holding LLC, Aearo Intermediate LLC, Aearo LLC, and Aearo Technologies LLC.

4. Attached hereto as **Exhibit 2** is a true and correct copy of Season 4's Privacy Notice.

5. Attached hereto as **Exhibit 3** is a true and correct copy of Season 4's Terms of Use.

6. Attached hereto as **Exhibit 4** is a true and correct copy of Season 4's Disclaimer.

7. Attached hereto as **Exhibit 5** is a true and correct copy of a letter dated March 31, 2020 from Season 4's counsel to Defendants counsel.

8. Attached hereto as **Exhibit 6** is a true and correct copy of the July 26, 2021 Certification of Edward Cerracchio.

9. Attached hereto as **Exhibit 7** is a true and correct copy of the July 26, 2021 Certification of Luis Betancourth.

Respectfully submitted,

Dated: September 10, 2021

/s/ Dominique J. Carroll
Dominique J. Carroll